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December 21, 2004

Via Facsimile (312) 886-1515

FOIA Officer

United States Environmental Protection Agency

Region 5

77 West Jackson Street

Chicago, Illinois 60604

Re: People of the State of Illinois, ex rel. Lisa Madigan, Attorney General of
the State of Illinois v. Precision Extrusion, Inc., et al. and LeClerc v.
LockFormer, et al.

Case Nos.: 2003CH000979 and 00 C 7164

Our File No.: 2004525-ELS/MAC

Dear Sir/Madam:

Pursuant to FOIA, I write this letter to request a file review of the following documents: information regarding the name (identity) of the "former employee of Principal Manufacturing Company" that was interviewed in early December 2002. The witness statement is referenced in the enclosed December 16, 2002 status report with the subject line Downers Grove Contaminated Groundwater initiative. I request a copy of the first lease of Principal Manufacturing Corporation at Janes Avenue, the asset-purchase agreement, and any statements by Paul Bennett as referenced in the December 16, 2002 Report. (The attached statement indicates that the asset purchase agreement and lease would be provided to the USEPA.)

I also request any statements made by William F. Helwig, Jr. and any documents, statements, summaries, reports and information from and by Joseph A. Malek related to his investigation of 5400-5410 Janes Street, in or around December, 2002.

FOIA Officer
December 21, 2004
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I would appreciate it if you would forward this request to the appropriate individual such that we can coordinate a time for a file review of the information in the file for the Ellsworth Industrial Park in Illinois. In the past, I know that such a review was coordinated with Fred Gage.

Please contact me if you have any questions or further concerns. I appreciate your anticipated cooperation in this matter.

Sincerely,


Molly A. Caprez

MAC/kak
Enclosure

DEC 17 2004 10:35
DEC 16 2004 12:34

JAN 21 1991 PM 11:00 N

12-18-82 01:24pm From-USEPA Region 5 ORC

312 888 7100

T-583 P.002/004 P-808

CONFIDENTIAL**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5 CHICAGO, ILLINOIS****ENFORCEMENT CONFIDENTIAL****DATE:** December 16, 2002**SUBJECT:** Downers Grove Contaminated Groundwater Initiative**FROM:** Joseph A. Malek SE-5J
Phone 312-353-2007**TO:** Carol Ropski, BESS
Steve Paryan, OSC
Tom Krueger, ORC
Tom Crause, IEPA**CC:** Bill Messenger, BESS

To keep you current on the status of the current investigation aimed at seeking sources of groundwater contamination in the area of the Ellsworth subdivision, you should know the following:

A former employee of Principal Manufacturing Company was located and interviewed last week. He told me that during 1976 a Mr. Edward Leonard, sole owner of a Principal Manufacturing Company which occupied a portion of the building located at 8402 Jones, died being survived by his widow whose name he could not recall. The widow enlisted the help of one of her relatives (maybe a nephew) who lived somewhere down in southern U.S., maybe Mississippi and who was a lumber salesman to help her run the place. This employee said,

He tried to manage our place all the way from down there and only came up maybe one or twice a month. Our place really was going to hell after Ed's death and we had to begin our costs. It was during that time that I saw my co-workers dump out 55 gallon drums of waste oils and lubricants right out the north exit door near one of our service doors. I would have to say that this dumping may have occurred over at least two years, maybe longer.

We probably took delivery from a company called Maggie Brothers which was then located somewhere on the east coast

DEC 17 2004 10:37
DEC 18 2004 12:34

T-206 P.03/04 F-168

12-18-02 11:24am From:OSEPA Region 5 ORC

312 866 7180

7-403 P.003/004 F-103

CONFIDENTIAL

of 2 - 3 drums each month of TCS. We also got Hardcut from a company called Hankstater or something like that and hydraulic and machine oils from other companies which were stored inside the loading dock area. On the far southwest side of our plant - we probably only then occupied one-fourth of the entire building - we had a degreasing pit which stood maybe about 2-3 feet above the floor. Employees would bring their work to the degreaser and insert their work into it to clean it off.

I think it was for maybe 4 or 5 years that Ed's wife ran the place before it was sold to the current owner of Principal Manufacturing Company, a Mr. Bennett. Bennett operated Principal at the same location until about the late 1990's when he moved the operations to Broadview, Illinois. Ed, his widow and Mr. Bennett were leasing the space from a guy named, William Helwig who used to come personally to pick up his rent checks.

After Ed's death in order to save money, I guess, I saw two managers order Mexican staff at Principal to drain the degreaser pit into 55 gallon drums, roll the full drums to the door and just dump the liquid out onto the ground. I protested more than once to them but I guess they just kept doing it. It was not long after this dumping that I happened to comment while eating lunch at an area where employees could eat outside that the ground area under that door appeared to be devoid of grass. This barren area was about 6 feet wide, 18 feet long and sloped northward toward a small swale but I do not know where the surface water drained from there. I also suspect that they also dumped this stuff down into the sewer after they got tired of my complaints. Everyone knew that the stuff that they were dumping was killing it.

End of interview.

Once the interview was concluded, this employee and I drove to the building that Principal occupied in the Ellsworth subdivision. The facility is now occupied by Tricon which has its principal offices around the corner on Wisconsin Avenue. There the employee pointed out the door and ground area where the dumping took place. Later that day, with Steve's concurrence, I enlisted the help of Keith Lesniak to stake and mark the area in anticipation of some sampling taking place there. Before leaving I talked with both William Helwig and a Tricon representative about site access but no definite arrangements were made for the

DEC 21 2004 13:28

T-205 P.04/04 F-158

-12-16-02 01:24pm From USAPA Region E. ORC

312 894 7160

T-693 P.004/004 F-308

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testing.

I had an occasion to visit with Mr. Bennett at his Broadview office. He has tentatively agreed to furnish me with his first lease at the Janes Avenue facility and with my asset purchase agreement. Some of his current employees are carry-overs from Ed Leonard's operations.

Information on different
plant redacted

END OF REPORT